IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,	& & & &	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO:
	§	5:21-CV-0844-XR
	§	
GREGORY W. ABBOTT, et al.,	§	
	§	
Defendants.	Ü	

DEFENDANTS MICHAEL SCARPELLO AND JOHN CREUZOT'S DESIGNATION OF POTENTIAL TESTIFYING EXPERTS

Defendants Michael Scarpello and John Creuzot, by and through their undersigned attorneys, hereby submits their Designation of Potential Testifying Experts.

I. Potential Testifying Experts

Russell Roden, Attorney Fees Expert Jason Schuette, Attorney Fees Expert c/o Dallas County Criminal District Attorney's Office Civil Division (the undersigned counsel of record) 500 Elm Street, Suite 6300 Dallas, Texas 75202

Mr. Roden and Mr. Schuette may present testimony regarding attorneys' fees in this matter. Defendants Scarpello and Creuzot reserve the right to designate and call any expert witnesses identified by Plaintiffs, Co-Defendants, or Intervenors.

The parties have not yet completed discovery in this case. Defendants Scarpello and Creuzot therefore reserve the right to supplement this Designation pursuant to the Court's Scheduling Order and the Federal Rules of Civil Procedure if additional witnesses are identified during discovery.

Respectfully submitted,

JOHN CREUZOT DISTRICT ATTORNEY

/s/ Barbara S. Nicholas
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CERTIFICATE OF SERVICE

I, hereby certify that the foregoing document was filed electronically on March 23, 2022, with the Clerk of the Court for the Western District of Texas by using the CM/ECF system, causing electronic service upon all counsel of record.

<u>/s/ Barbara S. Nicholas</u> BARBARA S. NICHOLAS